

## **REMARKS**

The Office Action dated January 10, 2006, has been received and carefully noted. The following remarks are submitted as a full and complete response thereto.

Claims 1-46 are currently pending in the application, of which claims 1-16 and 21-46 have previously been allowed. Applicants again thank the Examiner for the indication that claims 1-16 and 21-46 have been allowed. Claims 17-20 are respectfully submitted for consideration in view of the following remarks.

### **Rejections under 35 U.S.C. 102(e)**

Claims 17-20 were rejected under 35 U.S.C. 102(e) as being anticipated by U.S. Patent Application Publication No. 2002/0168984 of Wallentin ("Wallentin"). Applicants respectfully traverse this rejection.

Claim 17, upon which claim 18 depends, is directed to a network element for handling radio resource control in a radio access network. The network element includes means for receiving a relocation-specific information. The network element also includes means for establishing, in response to the receipt of said relocation-specific information, a link to a drift network element specified by said relocation-specific information. The network element further comprises means for initiating a downlink bi-casting procedure to said network element and to a serving network element to be subjected to relocation, or a downlink transport forwarding procedure from said serving network element to said network element.

Claim 19, upon which claim 20 depends, is directed to a network element for handling radio resource control in a radio access network. The network element includes means for adding an identification information to a relocation-specific information, said identification information identifying a drift network element supporting said network element in serving a user equipment. The network element also includes means for transmitting said relocation-specific information to a target network element to which radio resource control of said user equipment is to be relocated.

As discussed in the specification, certain embodiments of the present invention can provide a relocation procedure that can improve radio performance. It is respectfully submitted that the cited art of Wallentin fails to disclose or suggest all the elements of any of the presently pending claims. Therefore the prior art fails to provide the critical and unobvious advantages discussed above.

Wallentin generally relates to **releasing** plural radio connections with an omnibus **release** message. Wallentin aims to solve a problem residing in delay and traffic load resulting from a sudden **release** of all connections belonging to a Radio Network Controller (RNC) in a failure situation, as explained at paragraph 0015. Accordingly, it is an object of Wallentin to provide “more efficient **release** of radio connections” (emphasis added) in a radio access network, as explained at paragraph 0016.

This problem and solution does not have anything in common with the problem and objects of various embodiments of the present invention and cannot achieve the critical and unobvious advantages described above.

Moreover, Wallentin essentially describes providing a so-called “omnibus **release** message” prepared by a control node of the radio access network, so that, when a first selected parameter thereof has a predetermined value, all radio connections controlled by the RNC node are **released**. The RNC node can be either a serving RNC (SRNC) or a drift RNC (DRNC). However, Wallentin is silent as to relocation-specific information.

In direct contrast, claims 17 and 19 recite limitations relating to “relocation-specific information,” namely “means for receiving a relocation-specific information” (claim 17) and “means for transmitting said relocation-specific information to a target network element to which radio resource control of said user equipment” (claim 19).

The Office Action, without any written analysis, took the apparent position that these features are disclosed somewhere in Figure 2 and/or paragraphs 0018-0019 and 0046-0048 of Wallentin. Without an explanation of how Wallentin is alleged to teach each of the elements of the claims, it is difficult to ascertain the grounds of the rejection. Accordingly, if the rejection is maintained, it is respectfully requested that the Office Action point out where the reference teaches each of the elements of the claims. As outlined in MPEP 2132, in order for a reference to anticipate a claim, the reference must teach each and every element of the claim. Applicants respectfully disagree with the Office Action’s implicit analysis.

Nowhere in Figure 2, or paragraphs 0018-0019 or 0046-0048 of Wallentin is “relocation-specific information” even mentioned. Indeed, the word “relocation” is not even used in Wallentin. Furthermore, although various “information elements” are

discussed in Wallentin, none of them can be considered “relocation-specific” information. Indeed, as explained at paragraph 0059 of Wallentin, when Wallentin’s DRNC sends out an omnibus release message, it sends it out to all cells under its control, not to some particular user equipments (UEs) within those cells. Alternatively, as mentioned in paragraph 0068, all UEs of a particular SRNC can be released with the omnibus release message.

Therefore, Wallentin does not and cannot disclose or suggest “means for receiving a relocation-specific information” (as recited by claim 17) or “means for transmitting said relocation-specific information to a target network element to which radio resource control of said user equipment” (as recited by claim 19).

Claims 18 and 20 depend respectively from claims 17 and 19 and recite additional limitations. Therefore, it is respectfully submitted that claims 18 and 20 recite subject matter that is neither disclosed nor suggested in the cited reference. Thus, it is respectfully requested that the rejection of claims 17-20 be withdrawn.

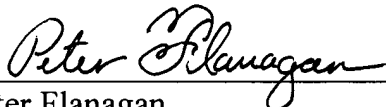
### **Conclusion**

For the reasons explained above it is respectfully submitted that each of claims 17-20 recites subject matter that is neither disclosed nor suggested in the prior art of record. Claims 1-16 and 21-46 have been allowed. Therefore, it is respectfully requested that all of claims 1-46 be allowed, and that this application be passed to issue.

If for any reason the Examiner determines that the application is not now in condition for allowance, it is respectfully requested that the Examiner contact, by telephone, Applicants' undersigned attorney at the indicated telephone number to arrange for an interview to expedite the disposition of this application.

In the event this paper is not being timely filed, Applicants respectfully petition for an appropriate extension of time. Any fees for such an extension together with any additional fees may be charged to Counsel's Deposit Account 50-2222.

Respectfully submitted,

  
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Enclosures: Petition for a One-Month Extension of Time  
Check No. 14352